UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

SANAA TAGHI, individually and on behalf of herself and all others similarly situated,

Plaintiff.

v.

VAN RU CREDIT CORPORATION,

Defendant.

Civil Action No. 1:15-cv-10605-FDS

JOINT NOTICE OF SETTLEMENT

Plaintiff Sanaa Taghi, and Defendant Van Ru Credit Corporation (collectively, the "Parties"), by counsel, hereby notify the Court that the Parties have agreed to settle the matters at issue between them in the present action on an individual (i.e., not class-wide) basis. The Parties are in the process of reducing their agreement to writing and upon finalization and execution of the settlement document(s), the parties will file an appropriate stipulation of dismissal.

In light of the agreed settlement, the Parties, by counsel, respectfully request that the Court enter an order staying all deadlines currently set forth in the Court's Scheduling Order (ECF No. 17), including vacating the order to attend the telephonic status conference currently scheduled to occur on October 30, 2015 at 2:10 p.m.

Dated: October 14, 2015

SANAA TAGHI, individually and on behalf of herself and all others similarly situated

By:	Kevin Crick	
-----	-------------	--

Kevin Crick, Esq. Consumer Rights Law Firm, PLLC 133 Main St., Second Floor North Andover, MA 01845 Telephone: (978) 420-4747

Fax: (888) 712-4458

Email: kevinc@consumerlawfirmcenter.com

Attorney for Plaintiff Sanaa Taghi

VAN RU CREDIT CORPORATION

By: <u>Ben Dunlap</u>
Kevin G. Kenneally (BBO # 550050)
Ben N. Dunlap (BBO# 661648)
LeClairRyan, *A Professional Corporation*One International Place, 11th Floor
Boston, MA 02110-2602
Telephone: (617) 502-8205

Telephone: (617) 502-8205 Fax: (617) 502-8255

Email: Kevin.Kenneally@leclairryan.com

Email: Ben.Dunlap@leclairryan.com

David Anthony, Esq. (admitted pro hac vice) Ethan G. Ostroff, Esq. (admitted pro hac vice) Troutman Sanders, LLP 222 Central Park Avenue, Suite 2000,

Virginia Beach, VA 23462

Telephone: (757) 687-7541 Fax: (757) 687-1541

Email: <u>David.Anthony@troutmansanders.com</u> Email: <u>Ethan.Ostroff@troutmansanders.com</u>

Attorneys for Defendant Van Ru Credit Corporation

CERTIFICATE OF SERVICE

I hereby certify that on October 14, 2015, I electronically filed the within and foregoing *Joint Notice of Settlement* with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following parties to this matter via electronic notification or otherwise:

Counsel for Plaintiff

Kevin V. K. Crick, Esq. BBO: 680950 Consumer Rights Law Firm, PLLC 133 Main St., Second Floor North Andover, Massachusetts 01845 Telephone: (978) 420-4747 Facsimile: (978) 409-1486

E-mail: kevinc@consumerlawfirmcenter.com

<u>/s</u> /	Ben Dunlap	
	•	

Attorney for Defendant

27304662v1